

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LOVENIA J. BREWER,)	
)	
Plaintiff,)	
)	
v.)	
)	COURT FILE NO. 08 CV 895
ARROW FINANCIAL SERVICES, L.L.C., and)	
DATA SEARCH N.Y., INC. d/b/a TRAK)	Judge Conlon
AMERICA, LLC and TRAK AMERICA,)	
)	Magistrate Judge Mason
Defendants.)	
)	
)	

UNOPPOSED/AGREED MOTION FOR EXTENSION OF TIME

Defendants, ARROW FINANCIAL SERVICES, LLC, DATA SEARCH N.Y., INC. d/b/a TRAK AMERICA, LLC and TRAK AMERICA, by their attorney, Todd P. Stelter, and pursuant to Federal Rule of Civil Procedure 6(b), respectfully request that this court grant a 21 day extension of time, or up until April 9, 2008, to file a responsive pleading to Plaintiff's Complaint, and in support thereof, states as follows:

1. Plaintiff's Complaint purports to state a claim under the Fair Debt Collection Practices Act against the defendants. Plaintiff's Complaint is one of several class action lawsuits recently filed against the DATA SEARCH N.Y., INC. a/b/a TRAK AMERICA, LLC and TRAK AMERICA defendant by plaintiff's law firm in the Northern District of Illinois containing similar allegations, including *Bradley v. Data Search N.Y. et al.*; Case No.: 08 CV 1010 pending before Judge Castillo, *Sylverne v. Data Search N.Y. et al.*; Case No.: 08 CV 31 pending before Judge Guzman and *Pecaro v. Data Search N.Y. et al.*; Case No.: 08 C 1088 pending before Judge Bucklo.

2. Plaintiff's Complaint was filed on February 12, 2008, and there have been no prior extensions granted in this case.

3. Defense counsel was recently retained and requires additional time to perform factual investigation prior to answering or otherwise pleading. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response in conjunction with the multiple cases filed against defendants.

4. Defense counsel has contacted plaintiff's counsel and there is no opposition to this extension.

WHEREFORE, defendants respectfully request this court grant an extension of time up to and including April 9, 2008, to file a responsive pleading to Plaintiff's Complaint.

Respectfully submitted,

By: s/Todd P. Stelter

Todd P. Stelter
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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2008, I electronically filed **MOTION FOR EXTENSION OF TIME** with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following:

Dan Edelman
dedelman@edcombs.com

Respectfully submitted,

By: s/Todd P. Stelter

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